

September 15, 2013

Mr. James Saric  
Remedial Project Manager  
USEPA Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3511

Subject: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Supplemental Remedial Investigations/Feasibility Studies  
Monthly Progress Report, August

Dear Jim:

Attached is the 78<sup>th</sup> monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). The monthly progress report is submitted per Paragraph 37 of the February 2007 Administrative Settlement Agreement and Order on Consent (AOC), Docket No. V-W-07-C-864, and Section 7.1 of the associated Statement of Work (SOW). This report is also submitted per Paragraph 19a of the 2007 AOC for Removal Action (Docket No. V-W-07-C-863) and Paragraph 19a of the 2009 AOC for Removal Action (Docket No. V-W-09-C-925).

If you have any questions, please do not hesitate to contact me.

Sincerely,



L. Chase Fortenberry, PG  
Manager – Environmental Engineering, Environmental Affairs  
Georgia-Pacific LLC

Attachments

cc: Michael Berkoff, USEPA  
Ramon Mendoza, USEPA  
Paul Bucholtz, MDEQ  
Judith Alfano, MDEQ  
Sharon Hanshue, MDNR  
Jeff Keiser, CH2M HILL  
Todd Goeks, NOAA  
Jessica Winter, NOAA  
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Richard Gay, Weyerhaeuser Company  
Martin Lebo, Ph.D., Weyerhaeuser Company  
Kathy Huibregtse, ENVIRON  
Garry Griffith, P.E., Georgia-Pacific LLC  
Garret E. Bondy, P.E., AMEC E&I, Inc.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS**

**REPORT #78, AUGUST 2013**

**Significant Developments and Activities during the Period:**

- On August 12, 2013, AMEC, on behalf of Georgia-Pacific, notified USEPA and MDEQ that sediment samples would be collected from the Pine Creek area within Area 3 on August 21, 2013.
- On August 13, 2013 Georgia-Pacific submitted a letter to USEPA formally requesting a change in the bank monitoring program for Plainwell No. 2 Dam TCRA site for 2013. Also included in the letter was the additional information requested by USEPA following the June 11, 2013 final inspection of the former Plainwell Impoundment for the angular rock armor and live stakes.
- On August 15, 2013, Georgia-Pacific submitted an evaluation and update of the project master schedule to USEPA. The schedule submittal was included with the 77<sup>th</sup> monthly and 13<sup>th</sup> semi-annual progress reports and was submitted in accordance with Exhibit A, Section D of the SOW associated with the February 2007 AOC for RI/FS.
- On August 21, 2013, AMEC collected Pine Creek area (Area 3) sediment samples outlined in the *Area 3 SRI/FS Supplemental FSP*.
- On August 23, 2013, Georgia-Pacific, AMEC, USEPA-Superfund, and USEPA-GLNPO attended a conference call to discuss the proposed plans for removal of the Otsego City and Otsego Township Dams.
- On August 26, 2013, TestAmerica notified AMEC and Georgia-Pacific that an error had occurred when shipping the Pine Creek area (Area 3) sediment samples between laboratory facilities.
- On August 27, 2013, AMEC and Georgia-Pacific determined that Pine Creek area (Area 3) sediment samples would have to be recollected.
- On August 28, 2013, AMEC, on behalf of Georgia-Pacific, notified USEPA and MDEQ that sediment samples would be recollected from the Pine Creek area within Area 3 on September 4, 2013. The samples were recollected due to a laboratory shipping error.
- On August 28, 2013, Georgia-Pacific, USEPA, MDEQ, and their consultants attended a conference call to discuss preliminary comments on the revised *Draft Area 1 FS*. Preliminary comments were provided by USEPA to Georgia-Pacific and AMEC via email, following the conference call.
- On August 28, 2013 USEPA provided written approval of the requested changes to the bank monitoring program related to the Plainwell No. 2 Dam TCRA for 2013. USEPA also stated that the agency has no further comments on the 2012 Bank Condition Monitoring Report related to the former Plainwell Impoundment and the Plainwell No. 2 Dam Area TCRAs, and that USEPA requires no further work from Georgia-Pacific related to the former Plainwell Impoundment TCRA.
- In August, the project Work Group continued periodic meetings to evaluate Area 2 SWAC calculation and fish trend analysis methodologies.
- Georgia-Pacific awaits the following:
  - MDEQ's complete response to the January 9, 2013 Freedom of Information Act request.
  - USEPA comments on the revised *Draft Area 1 FS*, submitted July 29, 2013.

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site SRI/FS**

**REPORT #78, AUGUST 2013**

**Data Collected and Field Activities Conducted during the Period**

- Field activities outlined in the USEPA-approved *Area 3 SRI/FS Work Plan and Supplemental FSP* were initiated on July 15, 2013. These activities continued through August in the Pine Creek area within Area 3.

**Laboratory Data Received during the Period**

- Georgia-Pacific has received partial data for the soil and sediment samples collected during completion of the *Area 3 SRI/FS Supplemental FSP* activities. AMEC is in the process of validating the data, and it is anticipated that laboratory data will be provided to USEPA with the September 2013 monthly progress report.

**Problems**

- Due to a laboratory shipping error, it was determined that sediment samples collected at the Pine Creek area within Area 3 would be recollected.

**Actions Taken to Correct Problems**

- On August 28, 2013, AMEC, on behalf of Georgia-Pacific, notified USEPA and MDEQ that sediment samples would be recollected from the Pine Creek area within Area 3 on September 4, 2013.

**Developments Anticipated during the Next Two Reporting Periods**

- Georgia-Pacific anticipates receipt of USEPA comments on the revised *Draft Area 1 FS*.
- Georgia-Pacific anticipates recollection of sediment samples in Pine Creek portion of Area 3 on September 4, 2013.
- Georgia-Pacific anticipates receipt of remaining laboratory data from the Area 3 Supplemental FSP field activities.
- Georgia-Pacific plans to submit the *2013 Spring Bank Condition Monitoring Report for the Plainwell No. 2 Dam Area* to USEPA for review and host a conference call with USEPA and the river trustees to discuss options for planned bank restoration work during the month of September.
- Georgia-Pacific plans to submit the revised *Draft Area 2 SRI Report* to USEPA for review during the month of September.